

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

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UNITED STATES OF AMERICA

) INDICTMENT NO.

v.
JACOB BRAGG

-)
-) 18 U.S.C. § 1951
-) Interference with Commerce by
-) Robbery, Conspiracy
-)
-) 18 U.S.C. § 924(o)
-) Conspiracy to Possess a Firearm in
-) Furtherance of a Crime of Violence
-)
-) 18 U.S.C. § 924(c)
-) Possession of a Firearm in
-) Furtherance of a Crime of Violence

THE GRAND JURY CHARGES THAT:

CR 422 - 098

INTRODUCTION

At all times material to this indictment, the following businesses operated convenience stores in Chatham County, Georgia that sell items such as food, beverages, and other items commonly sold at convenience stores: Mini Mart, located at 403 U.S. Highway 80 in Garden City, Georgia; Mr. Fuel, located at 1504 Dean Forest Road in Garden City, Georgia; and the Lottery Store, located at 1554 U.S. Highway 80 East in Pooler, Georgia. These businesses were businesses that affected interstate commerce.

COUNT ONE

Conspiracy to Interfere with Commerce by Robbery
18 U.S.C. § 1951(a)

In or around October 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did knowingly and intentionally combine, conspire, confederate, and agree with at least one other person to obstruct commerce and the movement of articles and commodities in such commerce by robbery, in that the defendant conspired to unlawfully take and obtain property from Chatham County convenience stores, against the will of and from the persons and in the presence of store employees, by means of actual and threatened force, violence, and fear of injury to the employees.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

*Conspiracy to Possess a Firearm in
Furtherance of a Crime of Violence*
18 U.S.C. § 924(o)

In or around October 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did knowingly and intentionally combine, conspire, and agree with at least one other person to possess a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a).

All in violation of Title 18, United States Code, Section 924(o).

COUNT THREE

Interference with Commerce by Robbery
18 U.S.C. § 1951(a)

On or about October 9, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

aiding and abetting another, did obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that Defendant, aided and abetted by another, did unlawfully take and obtain property consisting of merchandise and United States Currency from Mini Mart, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, Defendant and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take property belonging to the business.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

COUNT FOUR

Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)

On or about October 9, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did aid and abet the possession and brandishing of a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 3 of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c) & 2.

COUNT FIVE

Interference with Commerce by Robbery
18 U.S.C. § 1951(a)

On or about October 12, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that Defendant did unlawfully take and obtain property consisting of United States Currency from Mr. Fuel, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business, and did aid and abet another in so doing.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

COUNT SIX

Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)

On or about October 12, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did knowingly possess and brandish a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 5 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SEVEN

Interference with Commerce by Robbery
18 U.S.C. § 1951(a)

On or about October 13, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

aiding and abetting another, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in said statute, in that the Defendant and an accomplice did unlawfully take and obtain merchandise and United States Currency from the Lottery Store, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's

custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business.

All in violation of Title 18, United States Code, Sections 1951(a) & 2.

COUNT EIGHT

Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)

On or about October 13, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did aid and abet the possession and brandishing of a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 7 of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c) & 2.

COUNT NINE

Interference with Commerce by Robbery
18 U.S.C. § 1951(a)

On or about October 16, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

aiding and abetting another, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in

said statute, in that Defendant did unlawfully take and obtain merchandise and United States Currency from Mini Mart, against the will of at least one employee by means of actual and threatened force, violence and fear of injury, immediate and future, to the employee, and to property in the employee's custody and possession, that is, he and an accomplice did enter the business, brandish and use a firearm, threaten at least one employee, and take money belonging to the business.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TEN

Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)

On or about October 16, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

JACOB BRAGG,

did knowingly possess and brandish a firearm, to wit, a handgun, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 9 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Ten of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses charged in Counts One through Ten in violation of Title 18, United States Code, Sections 1951(a) and 924 set forth in this Indictment, **JACOB BRAGG**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and shall forfeit, pursuant to Title 18, United States Code, Section 924(d), any firearm and ammunition involved in the commission of the offense(s), including, but not limited to, a SCCY CPX-1 9 mm caliber pistol bearing serial number 068906 and Glock 43x 9 mm caliber pistol bearing serial number BNUL435.

A True Bill.

Foreperson



David H. Estes
United States Attorney



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